## **MEMO ENDORSED**

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## **ROBERT DIDIO & ASSOCIATES**

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BY ECF

January 4, 2021

The Honorable Valerie E. Caproni United States District Judge Southern District of New York Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York, New York 10007-1312

Re:

United States of America v. Jamal Watson

Case#1:19-cr-00212-VEC

Request For Adjournment of Surrender

Dear Judge Caproni,

I respectfully ask that Your Honor consider this request I make on behalf of my client, Jamal Watson.

The Court has that Mr. Watson surrender to Fort Dix SCP on January 6, 2021.

I am writing to request that Mr. Watson's surrender date be delayed. As the Court is aware from his presentence submission, Mr. Watson suffers from several medical conditions which place him at high risk should he be exposed to COVID. According to the BOP website, Fort Dix SCP currently has the second highest COVID-positive inmate population of all Federal prisons, with 1,088 of 2,348 tested inmates testing positive. I am therefore requesting that Mr. Watson's surrender date be postponed for at least 90 days.

Mr. Watson has remained at liberty since his sentencing date, and will continue to fully comply with all applicable guidelines. There have been no problems or incidents to report.

Thank you very much for considering this request. I await the Court's directive.

Sincerely,

seph A. Lobosco, Esquire

## Case 1:19-cr-00212-VEC Document 284 Filed 01/05/21 Page 2 of 2

Application GRANTED. Mr. Watson's surrender date is hereby adjourned to April 5, 2021.

SO ORDERED.

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Date: January 4, 2021

HON. VALERIE CAPRONI

UNITED STATES DISTRICT JUDGE